

Exhibit 7

KENNETH CARUSO LAW
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September 30, 2024

Via Email

Aaron E. Nathan, Esq.
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, New York 10019

Re: *Ruby Freeman and Wandrea' Moss v. Rudolph W. Giuliani*,
Case No. 24-mc-353 (S.D.N.Y.)

Dear Aaron:

I write regarding your motion and objection to Mr. Giuliani's claim of exemption from execution for funds in Citibank account number [REDACTED] 1428 (the "Bank Account"). ECF 19.

The Bank Account was and remains used by Mr. Giuliani to receive his social security payments from the United States Treasury. Thus, the Bank Account is exempt from restraint pursuant to CPLR §5222 and CPLR §5222-a.

I attach bank statements for the account, for the period of February 1, 2024, to August 31, 2024, and a transaction report through September 30, 2024, which show that the following deposits were received from the Social Security Administration, for monthly social security payments to Mr. Giuliani:

<u>Payment Date</u>	<u>Amount Deposited</u>
September 25, 2024	\$4,717.00
August 28, 2024	\$4,717.00
July 24, 2024	\$4,717.00
June 26, 2024	\$4,717.00
May 22, 2024	\$4,717.00
April 24, 2024	\$4,717.00
March 27, 2024	\$4,717.00
February 28, 2024	\$4,717.00

I direct your attention to your memorandum of law, ECF 19 at 1, which states: "Should Plaintiffs receive information establishing that any of the funds in question are in fact exempt from execution, plaintiffs will release the restraints on those funds forthwith." Please do that at this time, and also drop your motion, so that I will not need to write and file an unnecessary brief, which is due tomorrow.

Thank you very much.

Very truly yours,

/s/ Kenneth A. Caruso
Kenneth Caruso

Checking-1428



Available Now

On Deposit

\$8,999.80

\$18,868.00

Average Monthly
Balance:

\$13,862.59

Transactions

Scheduled

Advanced Search | View Last Statement | |

Time Period

Last 6 Months

Search

Show All

Results for: Mar 30, 2024 to Sep 30, 2024

The full amount of deposited funds may not be available for immediate withdrawal due to bank policy and regulatory requirements.

Date	Description	Debit	Credit	Available Balance
	Posted ⓘ			

Sep 25, 2024	ACH	\$4,717.00	\$18,868.00
	Electronic Credit XXSOCIAL SECURITY FOR RUDOLPH W GIULIANI		

Transaction Date Sep 25, 2024 01:04 AM ET

Posted On Sep 25, 2024

Transaction Type Deposit

Aug 28, 2024	ACH	\$4,717.00	\$14,151.00
	Electronic Credit XXSOCIAL SECURITY FOR RUDOLPH W GIULIANI		

Transaction Date Aug 28, 2024 01:04 AM ET

Posted On Aug 28, 2024

Transaction Type Deposit

Transaction Date Aug 13, 2024 12:00 AM ET

Posted On Aug 13, 2024

Transaction Type Withdrawal

Jul 24, 2024	ACH Electronic Credit XXSOCIAL SECURITY FOR RUDOLPH W GIULIANI	\$4,717.00	\$19,302.20
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Transaction Date Jul 24, 2024 01:36 AM ET

Posted On Jul 24, 2024

Transaction Type Deposit

Jun 26, 2024 ACH \$4,717.00 \$14,585.20
Electronic
Credit
XXSOCIAL
SECURITY
FOR
RUDOLPH
W GIULIANI

Transaction Date Jun 26, 2024 01:03 AM ET

Posted On Jun 26, 2024

Transaction Type Deposit

May 22, 2024 ACH \$4,717.00 \$9,868.20
Electronic
Credit
XXSOCIAL
SECURITY
FOR
RUDOLPH
W GIULIANI

Transaction Date May 22, 2024 01:08 AM ET

Posted On May 22, 2024

Transaction Type Deposit

Interest
Payment

Transaction Date May 19, 2024 12:00 AM ET

Posted On May 17, 2024

Transaction Type Dividend And Interest

Apr 30, 2024	Interest Payment	\$0.01	\$5,151.17
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Transaction Date Apr 30, 2024 12:00 AM ET

Posted On Apr 30, 2024

Transaction Type Dividend And Interest

Apr 24, 2024	ACH Electronic Credit XXSOCIAL SECURITY FOR RUDOLPH W GIULIANI	\$4,717.00	\$5,151.16
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Posted On Apr 24, 2024

Transaction Type Deposit

End of Activity

Account activity is provided for your information only and is subject to revisions. It is not a substitute for your periodic statement, which is the official record of your account.

August 1 - August 31, 2024
 Citigold Private Client Account
 CPWM ACCOUNT C32091677 1428

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RUDOLPH W. GIULIANI
45 E. 66TH ST APT 10W
NEW YORK NY 10065-6159

CITIGOLD PRIVATE CLIENT SERVICES
PO Box 6201
Sioux Falls, SD 57117-6201

For Citigold Private Client Servicing: 888-500-5008

For banking, call your Relationship Manager:

*Scott Borg, 718-492-2703**

For investments, call your Financial Advisor:

*James Nicolaidis & Sean Broderick, 718-351-8679**

For TTY: We accept 711 or other Relay Service.

Website: www.citibank.com

Effective immediately Citi's wire transfer service for wires between accounts in the U.S. and Russia in RUB will be discontinued. Effective 9/21/24, wires between accounts in the U.S. and Russia in USD and EUR will be discontinued.

Your Citigold Private Client simplified banking Account Statement. Citi Personal Wealth Management ("CPWM") is a business of Citigroup Inc., which offers investment products through Citigroup Global Markets Inc. ("CGMI"), member SIPC. Insurance is offered through Citigroup Life Agency LLC ("CLA"). In California, CLA does business as Citigroup Life Insurance Agency, LLC (license number 0G56746). Unless otherwise indicated, investment products are held in a Citi Personal Wealth Management brokerage account, which is carried on behalf of CGMI by Pershing LLC, member SIPC, NYSE, FINRA. Citibank N.A., CLA and CGMI are affiliated companies under the common control of Citigroup Inc. The following summary portion of this statement is provided for information purposes and includes assets held at different entities.

Value of Accounts	Last Period	This Period
Citibank Accounts		
Checking		
Checking		
Citibank Total		
Citi Personal Wealth Management Accounts ¹		
Total IRA Account Value ²		
Citi Personal Wealth Management Total		
Citigold Private Client Relationship Total		

Earnings Summary	This Period	This Year
Citibank Accounts		
Checking		
Checking	0.00	
Citibank Total		
Citi Personal Wealth Management Accounts ¹		
Total IRA Account Value ²		
Citi Personal Wealth Management Total		
Citigold Private Client Relationship Total		

* To ensure quality service, calls are randomly monitored and may be recorded.

¹ INVESTMENT, INSURANCE AND ANNUITY PRODUCTS AND SERVICES (NON-DEPOSIT PRODUCTS) ARE NOT BANK PRODUCTS AND:

- Not insured by the FDIC or any other agency of the United States, Citibank, N.A. (the bank) or (if applicable) an affiliate of the bank
- Not a deposit or other obligation of, or guaranteed by, the bank or an affiliate of the bank
- Subject to investment risks, including possible loss of the principal amount invested.

² This is a combined total, as applicable, of all your traditional, Roth, SEP, SAR-SEP, and SIMPLE IRAs.

August 1 - August 31, 2024

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RUDOLPH W. GIULIANI

Citigold Private Client Account ■ 1428

CheckingChecking
Activity**Regular Checking ■ 1428**

Date	Description	Amount Subtracted	Amount Added	Balance
08/01/24	Opening Balance			19,302.20
08/13/24	Other Debit	9,868.20		9,434.00
08/28/24	ACH Electronic Credit XXXSOCIAL SECURITY FOR RUDOLPH W GIULIANI		4,717.00	14,151.00
	Total Subtracted/Added	9,868.20	4,717.00	
08/31/24	Closing Balance			14,151.00

July 1 - July 31, 2024
 Citigold Private Client Account
 CPWM ACCOUNT C32091677 1428

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Website: www.citibank.com

6-27-24 amendments to your applicable customer agreement include various updates to the Promotional Rate Feature for new Citi Savings accounts section along with a new subparagraph under Deposit Minimum Balance. Please visit www.citi.com/accountagreementsandnotices for more information.

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Citibank Accounts		
Checking		
Checking		
Citibank Total		
Citi Personal Wealth Management Accounts ¹		
Total IRA Account Value ²		
Citi Personal Wealth Management Total		
Citigold Private Client Relationship Total		

Earnings Summary	This Period	This Year
Citibank Accounts		
Checking		
Checking		
Citibank Total		
Citi Personal Wealth Management Accounts ¹		
Total IRA Account Value ²		
Citi Personal Wealth Management Total		
Citigold Private Client Relationship Total		

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- Not a deposit or other obligation of, or guaranteed by, the bank or an affiliate of the bank
- Subject to investment risks, including possible loss of the principal amount invested.

2 This is a combined total, as applicable, of all your traditional, Roth, SEP, SAR-SEP, and SIMPLE IRAs.

July 1 - July 31, 2024
 RUDOLPH W. GIULIANI
 Citigold Private Client Account ■■■1428

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Messages From Citigold Private Client

If you have questions about marketing communications, please visit www.citi.com/offersforyou or call 1-888-500-5008 (TTY: We accept 711 or other Relay Service).

You are Citigold Private Client for July 2024

Calendar Month ¹	Combined Average Monthly Balance Range ²	Relationship Tier ³
May 2024	\$1,000,000 - \$4,999,999	Citigold Private Client
June 2024	\$1,000,000 - \$4,999,999	Citigold Private Client
July 2024	\$1,000,000 - \$4,999,999	Citigold Private Client

Account Fees and Charges⁴

Account Type	Account	Monthly Service Fee	Rebate of Surcharges from Non- Citi ATM Transactions	Average Monthly Balance	Waiver Applied
Regular Checking	■■■1428	None	None	N/A	No Fee - CPC Waiver
Regular Checking	6791895812	None	\$4.00	N/A	No Fee - CPC Waiver
Total		None	\$4.00		

Fees. When not linked to a checking account, savings account balances (excluding Citi Miles Ahead Savings) for the calendar month prior to the end of the monthly statement period will be used to determine your Average Savings Balance, which determines if you receive a monthly service fee. All fees assessed in this Statement Cycle, including Non-Citi ATM fees, will appear as charges on the first Business Day of your next Account Statement. Please refer to your Client Manual Agreement for details on how we determine your monthly fees and charges.

Checking

Checking
Activity

Regular Checking ■■■1428

Date	Description	Amount Subtracted	Amount Added	Balance
07/01/24	Opening Balance			14,585.20
07/24/24	ACH Electronic Credit SS SOCIAL SECURITY FOR RUDOLPH W GIULIANI		4,717.00	19,302.20
07/31/24	Closing Balance			19,302.20

June 1 - June 30, 2024
 Citigold Private Client Account [REDACTED] 1428
 CPWM ACCOUNT C32091677

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RUDOLPH W. GIULIANI
45 E. 66TH ST APT 10W
NEW YORK NY 10065-6159

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Effective May 7, 2024, the Certificate of Deposit (CD) terms within your corresponding agreement are updated to reiterate that you agree to leave your funds in the CD account for the first six days after account opening or renewal. Please refer to your corresponding agreement for more information.

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Value of Accounts	Last Period	This Period
Citibank Accounts		
Checking		
Checking	[REDACTED]	[REDACTED]
Citibank Total	[REDACTED]	[REDACTED]
Citi Personal Wealth Management Accounts ¹		
Total IRA Account Value ²	[REDACTED]	[REDACTED]
Citi Personal Wealth Management Total	[REDACTED]	[REDACTED]
Citigold Private Client Relationship Total	[REDACTED]	[REDACTED]

Earnings Summary	This Period	This Year
Citibank Accounts		
Checking		
Checking	[REDACTED]	[REDACTED]
Citibank Total	[REDACTED]	[REDACTED]
Citi Personal Wealth Management Accounts ¹		
Total IRA Account Value ²	[REDACTED]	[REDACTED]
Citi Personal Wealth Management Total	[REDACTED]	[REDACTED]
Citigold Private Client Relationship Total	[REDACTED]	[REDACTED]

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June 1 - June 30, 2024
RUDOLPH W. GIULIANI
Citigold Private Client Account ■■■1428

CheckingChecking
Activity**Regular Checking ■■■1428**

Date	Description	Amount Subtracted	Amount Added	Balance
06/01/24	Opening Balance			9,868.20
06/26/24	ACH Electronic Credit XXSOCIAL SECURITY FOR RUDOLPH W GIULIANI		4,717.00	14,585.20
06/30/24	Closing Balance			14,585.20

May 20 - May 31, 2024
 Citigold Private Client Account [REDACTED] 1428
 CPWM ACCOUNT C32091677

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Value of Accounts	Last Period	This Period
Citibank Accounts		
Checking		
Checking	[REDACTED]	[REDACTED]
Citibank Total	[REDACTED]	[REDACTED]
Citi Personal Wealth Management Accounts ¹		
Total IRA Account Value ²	[REDACTED]	[REDACTED]
Citi Personal Wealth Management Total	[REDACTED]	[REDACTED]
Citigold Private Client Relationship Total	[REDACTED]	[REDACTED]

Earnings Summary	This Period	This Year
Citibank Accounts		
Checking		
Checking	[REDACTED]	[REDACTED]
Citibank Total	[REDACTED]	[REDACTED]
Citi Personal Wealth Management Accounts ¹		
Total IRA Account Value ²	[REDACTED]	[REDACTED]
Citi Personal Wealth Management Total	[REDACTED]	[REDACTED]
Citigold Private Client Relationship Total	[REDACTED]	[REDACTED]

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May 20 - May 31, 2024
RUDOLPH W. GIULIANI
Citigold Private Client Account ■■■1428

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CheckingChecking
Activity**Regular Checking ■■■1428**

Date	Description	Amount Subtracted	Amount Added	Balance
05/20/24	Opening Balance			5,151.20
05/20/24	Reimagine Product Conversion: from Int Checking to Reg Chec			5,151.20
05/22/24	ACH Electronic Credit XXSOCIAL SECURITY FOR RUDOLPH W GIULIANI		4,717.00	9,868.20
	Total Subtracted/Added	0.00	4,717.00	
05/31/24	Closing Balance			9,868.20

May 1 - May 19, 2024
Citigold Account

1428

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RUDOLPH W. GIULIANI
45 E. 66TH ST APT 10W
NEW YORK NY 10065-6159

CITIGOLD SERVICES
PO Box 6201
Sioux Falls, SD 57117-6201

Citigold Dedicated Servicing: 888-248-4465
 For TTY: We accept 711 or other Relay Service.
 Website: www.citibank.com

4-2-24 amendments to your applicable customer agreement include updates to interest rate exceptions & the promotional rate feature for new Citi Savings accounts. Please visit www.citi.com/accountagreementsandnotices for more information.

Your Citigold package Account Statement. The following summary portion of the statement is provided for informational purposes.

Value of Accounts	Last Period	This Period
Citibank Accounts		
Checking		
Checking	5,151.17	5,151.20
Citigold Relationship Total	\$5,151.17	\$5,151.20

Earnings Summary	This Period	This Year
Citibank Accounts		
Checking		
Checking	0.03	0.20
Citigold Relationship Total	\$0.03	\$0.20

* To ensure quality service, calls are randomly monitored and may be recorded.

May 1 - May 19, 2024
RUDOLPH W. GIULIANI
 Citigold Account [REDACTED] 1428

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Messages From Citigold

If you have questions about marketing communications, please visit www.citi.com/offersforyou or call 1-888-248-4465(TTY: We accept 711 or other Relay Service).

Your next Account Statement will be a simplified banking statement because at least one owner of an account on this statement has converted to simplified banking. Please keep this last package-based Account Statement for your records. If you have not yet converted, learn more about how simplified banking will impact you and your accounts by viewing your simplified banking snapshot and early access at citi.com/earlyaccess. For any questions, please contact us at (888) CITIGOLD or visit your local branch. For TTY: We accept 711 or other Relay Service.

Citigold Account Package Fees

The Citigold Account Package requires a minimum combined average monthly balance of \$200,000 in eligible linked deposit, retirement, and investment accounts. If you have a Citibank secured credit card, then Citibank will also include the balance in your Collateral Holding Account or your Certificate of Deposit that secures your Citibank credit card. These balances may be in accounts that are reported on other statements. If you do not maintain a minimum combined average monthly balance of \$200,000 in eligible linked deposit, retirement, and investment accounts, your Citigold Account Package will be converted to a Citi Priority Account Package, and your accounts will be subject to the terms and conditions then in effect for that package. Other banks and ATM service providers may charge you a fee when you conduct a Citibank deposit account transaction using their ATMs. You will receive reimbursement from Citibank for ATM fees charged by other banks in any statement period where you are eligible for Citigold.

Fees	Your Combined Balance Range \$1,500-\$5,999
Monthly Service Fee	None

Please refer to your Client Manual-Consumer Accounts and Marketplace Addendum booklet for details on how we determine your monthly fees and charges.

Checking

Checking
Activity

Citigold Interest Checking [REDACTED] 1428

Date	Description	Amount Subtracted	Amount Added	Balance
05/01/24	Opening Balance			5,151.17
05/17/24	Interest paid for 19 days, Annual Percentage Yield Earned 0.01%		0.03	5,151.20
05/19/24	Closing Balance			5,151.20

April 1 - April 30, 2024
Citigold Account

1428

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Your Citigold package Account Statement. The following summary portion of the statement is provided for informational purposes.

Value of Accounts	Last Period	This Period
Citibank Accounts		
Checking		
Checking	434.16	5,151.17
Citigold Relationship Total	\$434.16	\$5,151.17

Earnings Summary	This Period	This Year
Citibank Accounts		
Checking		
Checking	0.01	0.17
Citigold Relationship Total	\$0.01	\$0.17

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Messages From Citigold

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April 1 - April 30, 2024
RUDOLPH W. GIULIANI
 Citigold Account ■■■1428

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Fees	Your Combined Balance Range \$1,500-\$5,999
Monthly Service Fee	None

Please refer to your Client Manual-Consumer Accounts and Marketplace Addendum booklet for details on how we determine your monthly fees and charges.

Checking

Checking
Activity

Citigold Interest Checking ■■■1428

Date	Description	Amount Subtracted	Amount Added	Balance
04/01/24	Opening Balance			434.16
04/24/24	ACH Electronic Credit XXSOCIAL SECURITY FOR RUDOLPH W GIULIANI		4,717.00	5,151.16
04/30/24	Interest paid for 30 days, Annual Percentage Yield Earned 0.01%		0.01	5,151.17
	Total Subtracted/Added	0.00	4,717.01	
04/30/24	Closing Balance			5,151.17

March 1 - March 31, 2024
Citigold Account [REDACTED] 1428

Page 1 of 4

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As of August 19, 2023, the \$10.00 fee for Bond Coupon Redemption and \$25.00 fee for Consular/Verification Letters will no longer be charged for all account packages.

Your Citigold package Account Statement. The following summary portion of the statement is provided for informational purposes.

Value of Accounts	Last Period	This Period
Citibank Accounts		
Checking		
Checking	4,717.12	434.16
Citigold Relationship Total	\$4,717.12	\$434.16

Earnings Summary	This Period	This Year
Citibank Accounts		
Checking		
Checking	0.04	0.16
Citigold Relationship Total	\$0.04	\$0.16

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March 1 - March 31, 2024
RUDOLPH W. GIULIANI
Citigold Account ■ 1428

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CheckingChecking
Activity**Citigold Interest Checking ■ 1428**

Date	Description	Amount Subtracted	Amount Added	Balance
03/01/24	Opening Balance			4,717.12
03/27/24	ACH Electronic Credit XXSOCIAL SECURITY FOR RUDOLPH W GIULIANI		4,717.00	9,434.12
03/28/24	Transfer to Checking 10:27a #1472 ONLINE Reference # 000287	9,000.00		434.12
03/29/24	Interest paid for 31 days, Annual Percentage Yield Earned 0.01%		0.04	434.16
	Total Subtracted/Added	9,000.00	4,717.04	
03/31/24	Closing Balance			434.16

All transaction times and dates reflected are based on Eastern Time.

February 1 - February 29, 2024
Citigold Account [REDACTED] 1428

Page 1 of 4

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PO Box 6201
Sioux Falls, SD 57117-6201

Citigold Dedicated Servicing: 888-248-4465

For banking, call your Relationship Manager:

Scott Borg, 718-492-2703*

For investments, call your Financial Advisor:

James Nicolaidis & Sean Broderick, 718-351-8679*

For TTY: We accept 711 or other Relay Service.

Website: www.citibank.com

Your Citigold package Account Statement. The following summary portion of the statement is provided for informational purposes.

Value of Accounts	Last Period	This Period
Citibank Accounts		
Checking		
Checking	0.12	4,717.12
Citigold Relationship Total	\$0.12	\$4,717.12

Earnings Summary	This Period	This Year
Citibank Accounts		
Checking		
Checking	0.00	0.12
Citigold Relationship Total	\$0.00	\$0.12

* To ensure quality service, calls are randomly monitored and may be recorded.

February 1 - February 29, 2024
RUDOLPH W. GIULIANI
 Citigold Account [REDACTED] 1428

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Messages From Citigold

Effective March 1, 2024, the \$6.00 fee for Expedited Domestic Delivery of Replacement Debit Cards is waived for all other account packages. As of February 26, 2022, the \$7.00 fee for Pin Mailer Domestic Expedite and \$17.50 fee for Pin Mailer International Expedited was waived for all other account packages. All of these fees can be found within the "Other Fees and Charges for All Accounts" table of the Marketplace Addendum.

If you have questions about marketing communications, please visit www.citi.com/offersforyou or call 1-888-248-4465 (TTY: We accept 711 or other Relay Service).

Citigold Account Package Fees

The Citigold Account Package requires a minimum combined average monthly balance of \$200,000 in eligible linked deposit, retirement, and investment accounts. If you have a Citibank secured credit card, then Citibank will also include the balance in your Collateral Holding Account or your Certificate of Deposit that secures your Citibank credit card. These balances may be in accounts that are reported on other statements. If you do not maintain a minimum combined average monthly balance of \$200,000 in eligible linked deposit, retirement, and investment accounts, your Citigold Account Package will be converted to a Citi Priority Account Package, and your accounts will be subject to the terms and conditions then in effect for that package. Other banks and ATM service providers may charge you a fee when you conduct a Citibank deposit account transaction using their ATMs. You will receive reimbursement from Citibank for ATM fees charged by other banks in any statement period where you are eligible for Citigold.

Fees	Your Combined Balance Range \$10,000-\$24,999
Monthly Service Fee	None

Please refer to your Client Manual-Consumer Accounts and Marketplace Addendum booklet for details on how we determine your monthly fees and charges.

Checking

Checking
Activity

Citigold Interest Checking [REDACTED] 1428

Date	Description	Amount Subtracted	Amount Added	Balance
02/01/24	Opening Balance			0.12
02/28/24	ACH Electronic Credit XXS SOCIAL SECURITY FOR RUDOLPH W GIULIANI		4,717.00	4,717.12
02/29/24	Closing Balance			4,717.12